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9 Attorneys for Plaintiff
10 CHIQUITA FRESH NORTH AMERICA, L.L.C.

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13

14 CHIQUITA FRESH NORTH AMERICA,
L.L.C.,

15 Plaintiff,

16 v.

17 GREENE TRANSPORT COMPANY; JOHN
18 GREENE LOGISTICS COMPANY; and
DOES 1 through 20, inclusive,

19 Defendants.
20

No. C-11-06683-DMR

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND REBUTTAL
EXPERT DISCLOSURE AND EXPERT
DISCOVERY DEADLINES**

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22 **RECITALS**

23 1. On April 4, 2013 (in Docket Item No. 55), this Court set the following schedule for
24 expert discovery: expert disclosure and reports due June 15, 2013; rebuttal expert disclosure
25 and reports due June 30, 2013 and completion of expert discovery on July 14, 2013;

26 2. At the time the above expert deadlines were set, the trial of this matter was scheduled for
27 September 9, 2013;

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3. At the June 20, 2013 case management conference, the Court continued the trial of this matter to April 28, 2014;

4. On June 14, 2013, Defendant John Greene Logistics Company served its expert disclosure on the alter ego issue and this disclosure did not contain the expert report;

5. On June 21, 2013, Defendant John Greene Logistics Company served its expert report;

6. Given the continuance of the trial and the delay in service of Defendant John Greene Logistics Company's expert report, the parties believe there is good cause for Plaintiff Chiquita Fresh North America, LLC to have until July 15, 2013 to serve its rebuttal expert report and disclosure and that expert discovery be completed by September 12, 2013;

Accordingly, the parties HEREBY STIPULATE as follows:

STIPULATION

1. The deadline for service of rebuttal expert disclosure and reports is continued from June 30, 2013 to July 15, 2013;

2. The deadline for completing expert discovery is continued from July 14, 2013 to September 12, 2013.

DATED: June 24, 2013

BURNHAM BROWN

By: /s/ Robert M. Bodzin
ROBERT M. BODZIN
RAYMOND A. GREENE, III
ALISON F. GREENE
Attorneys for Plaintiff
CHIQUITA FRESH
NORTH AMERICA, L.L.C.

DATED: June 24, 2013

LOW BALL & LYNCH

By: /s/
MARK F. HAZELWOOD
DIRK D. LARSEN
Attorneys for Defendant
GREENE TRANSPORT COMPANY

1
2 DATED: June 24, 2013

PHILLIPS, SPALLAS & ANGSTADT

3
4 By: /s/

TODD ANGSTADT

5 ELISA RHEIN MARCALETTI

6 Attorneys for Defendant

7 JOHN GREENE LOGISTICS COMPANY
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~~PROPOSED~~ ORDER

1. The deadline for service of rebuttal expert disclosure and reports is continued from June 30, 2013 to July 15, 2013;

2. The deadline for completing expert discovery is continued from July 14, 2013 to September 12, 2013.

IT IS SO ORDERED.

DATED: June 26, 2013



DONNA M. RYU
United States Magistrate Judge

4814-8687-1572, v. 1